

State of California



Fair Political Practices Commission

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September 18, 1984

Assemblyman Bruce C. Bronzan
State Capitol, Room 3147
Sacramento, CA 95814

Re: Your Request for Advice,
Our Advice No. A-84-217

Dear Assemblyman Bronzan:

In your August 20, 1984, request for advice you raise a number of novel and important questions regarding the Political Reform Act which have not previously been addressed by the Commission. We do not feel it is appropriate for the staff to resolve these issues without Commission guidance. Therefore, at the next Commission meeting, we intend to ask the full Commission to issue a formal opinion in response to your questions. 2 Cal. Adm. Code Section 18329(b); Government Code Section 83114(a). If the Commission agrees to issue an opinion, a hearing on the questions you have raised will be scheduled, probably in November or December. The procedures for such a hearing are set forth in our regulation 2 Cal. Adm. Code Section 18322 (copy enclosed).

Pending the resolution of these issues by the full Commission, I can only give you limited advice. First, the Political Reform Act does not prohibit the Forum, or any other group, from employing you or your staff members, or from paying expenses for you or your staff.^{1/} The Political Reform Act only imposes reporting or disqualification requirements on public officials and committees. Since it is quite possible that you, your committee staff, the Forum, and contributors to the Forum could incur reporting responsibilities under the Act, I suggest that you and the Forum both keep careful records of all contributions to the Forum and all expenditures by the

^{1/} However, you should consult the Legislative Counsel as to whether a staff member can be paid by the Forum for work which the staff member is supposed to perform as a legislative employee.

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Forum. In addition, if any employee of the Forum qualifies as a lobbyist under 2 Cal. Adm. Code Section 18239 (copy enclosed) both the lobbyist and the Forum will have to file with the Secretary of State.

I am sorry that we cannot give you any more definite advice at this time. However, we will encourage the Commission to address the questions you raise as promptly as is possible.

Very truly yours,


Barbara A. Milman
General Counsel

BAM:km
Enclosures